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18 MR. BUQO: Good afternoon. My name is Tom Buqo.

SEP 27 1999

19 I reside at 4 Private Road in Blue Diamond, Nevada.

20 Since August 1996, I've been a consultant to the

21 Nye County Nuclear Waste project office on water resource

22 issues.

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23 I am the author of two documents cited in the

24 Yucca Mountain Draft Environmental Impact Statement. Copies of

25 those reports are available on the Yucca home page and portions

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1...

1 of these reports have been quoted and misquoted in the Draft
2 EIS.

3 I will be commenting on the portions of the Draft
4 EIS related to water resources.

2...

5 The result of Nye County's water resource
6 evaluations found that the direct impact of water withdrawals
7 for the proposed repository will be limited to a localized
8 lowering of water levels that was not deemed significant.

9 However, the evaluations did find the predicted
10 leaking from the repository and the cumulative impacts of the
11 proposed repository will be indeed be significant and that
12 mitigating measures must be implemented.

13 The Draft EIS is inadequate with regard to its
14 evaluation of impacts of water resources and corresponding
15 mitigation and must be revised extensively.

16 The cumulative impacts on water resources will
17 include the direct and indirect impacts of, one, the total
18 radiological burden that will be imposed on Nye County; two,
19 the impacts of federal land withdrawal from the resource
20 availability; three, the impacts of federal policies regarding
21 nuclear weapons testing, waste disposal and environmental
22 protection; and four, the water resource use and management
23 practices on both private and federal lands in the county.

24 The Department of Energy through their selection
25 of a reduced region of influence limited their analysis to only

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1 the direct impacts of their water withdrawal from a single
2 basin while ignoring documented impacts that occur over a much
3 broader region.

4 Further, the Department ignored other federally
5 prepared direct reports that detailed the direct, indirect and
6 cumulative impacts of Department of Defense, Energy and
7 Interior actions over the same period.

8 This approach is inconsistent with the CEQ
9 guidance for considering cumulative impact assessment under
10 NEPA and with 40 CFR 1508.25.

11 All the Yucca Mountain EIS says with regard to
12 cumulative impacts is that potential impacts to groundwater
13 would be small and limited to the immediate vicinity of the
14 land disturbances associated with the action, and that some
15 minor incremental risk would occur from drinking the
16 groundwater downgradient of the repository at some distant time
17 in the future.

18 This approach is inconsistent with statements
19 made in the Draft EIS, specifically in volume 1: The general
20 path of water that infiltrates through Yucca Mountain is south
21 towards Lathrop Wells, into and through the area around Death
22 Valley Junction and the lower Amargosa Valley.

23 Natural discharge of groundwater from beneath
24 Yucca Mountain probably occurs farther south at Franklin lake
25 Playa, and two, and volume 2, the implementation of the

2 cont.

1 proposed action could potentially affect the water supply and
2 Death Valley National Park, which is downgradient from Yucca
3 Mountain.

4 The region of influence evaluated for cumulative
5 impacts -- impacts cannot be smaller than the region over which
6 impacts are expected to occur.

7 Thus, the Department's approach is inconsistent
8 with the letter and intent of NEPA, CEQ guidance and other
9 federal documents, including specifically the Environmental
10 Impact Statement for the Nevada Test Site and the Special
11 Nevada Report.

12 If the Department of Energy chooses to continue
13 to ignore the local perspective by not evaluating the impact
14 identified in the Nye County document and by other federal
15 agencies, then it is imperative that Nye County's perspective
16 be clearly documented in the EIS as an opposing viewpoint.

17 That's what I had prepared.

18 Mr. Bradshaw referred to the wisdom of Congress.
19 I'm going to refer a little to the stupidity of Congress, okay?

20 Congress says we're going to put our waste closer
21 to the water table. We're going to put them in Yucca Mountain.
22 Yucca Mountain is not the best site in the State of Nevada nor
23 in Nye County or for this project.

24 When the county has 210 square miles that have
25 already been contaminated through underground nuclear testing,

1 why wouldn't the United States put it over there? Why must
2 they come in and put it in another area and contaminate more of
3 the groundwater?

4 I don't have the answer to that. Perhaps
5 Congress in their wisdom does.

6 Thank you.

7 MS. DIXON: Thank you.

8 MR. BROWN: Thank you.

9 Okay. The next speaker is Mary Ellen Giampaoli.